

AFFIDAVIT

STATE OF MISSOURI)
) ss.
COUNTY OF Greene)

1. My name is Mike Briggs and I am the President of Willow Brook Foods, Inc. ("Willow Brook").

2. Willow Brook is a relatively small meat processor based in Springfield, Missouri.

3. Willow Brook has never owned a poultry grow out operation in the State of Oklahoma ("State") or the Illinois River Watershed ("IRW").

4. Willow Brook has never owned any poultry litter and has never land applied any poultry litter in the IRW.

5. At the time Willow Brook was added as a defendant in *Edmonson v. Tyson, et al.*, Case No. ("lawsuit"), Willow Brook had contracts with two independent growers in the State and in the IRW.

6. Since early 2007, Willow Brook has had a contract with only one independent grower in the State and the IRW.

7. Willow Brook does not have any contracts with growers in Arkansas that are located in the IRW.

8. The cost of defending this lawsuit has been greatly burdensome to Willow Brook.

9. Willow Brook has decided to permanently cease contracting with independent growers in the State of Oklahoma. The reason for this decision is to end any potential for liability from ongoing operations in the State and the IRW.

10. Willow Brook's sole remaining independent grower in the State and the IRW presently is growing out four flocks of birds owned by the company. Two of the four flocks will be sold in March 2008. The other two flocks will be sold by the end of June 2008.

11. By June 30, 2008, Willow Brook will no longer own any birds in the State and will no longer contract with any independent grower in the State.

12. Willow Brook does not have the right to exercise control over the operations of its final independent grower in the State and does not have the right to control the operation of any other grower in any state who contracts with Willow Brook. All of Willow Brook's growers are independent contractors by choice and by written contract.

13. Willow Brook's remaining grower in the State and IRW owns all of the poultry litter produced by his poultry feeding operations. This grower has informed Willow Brook that he does not land apply any poultry litter and sells all of his poultry litter to a third party who land applies it outside of the IRW.

Dated this 3 day of March, 2008.


Mike Briggs

Subscribed and sworn to before me this 3 day of March, 2008.


Notary Public

My Commission Expires:

